

PAUL HASTINGS

1(212) 318-6626
jamesbliss@paulhastings.com

August 5, 2020

VIA ECF AND ELECTRONIC MAIL

The Honorable Katherine Polk Failla
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Petróleos de Venezuela, et al. v. MUFG Union Bank, N.A., et. al.*, Case No. 1:19-cv-10023-KPF
(S.D.N.Y.)

Dear Judge Failla:

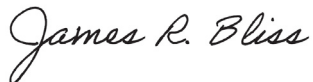
We write regarding the Court's July 29, 2020 order scheduling oral argument in this matter for September 22, 2020.

Unfortunately, counsel who will be arguing for PDV Holding has a long-scheduled argument before the D.C. Circuit on that date, and counsel for PDVSA and PDVSA Petróleo have a long-scheduled mediation the next day.

Plaintiffs respectfully request that oral argument be rescheduled for September 25, September 29, or September 30, whichever is the earliest convenient date for the Court. If none of these dates is convenient for the Court, the parties will promptly confer and propose other alternative dates.

The Trustee and the Collateral Agent consent to this request and respectfully join plaintiffs' request that oral argument be rescheduled for the earliest date that is convenient for the Court.

Respectfully,



James R. Bliss
of PAUL HASTINGS LLP

cc: Counsel of record